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May 15, 2025

VIA ECF

The Honorable Sidney H. Stein United States District Judge United States District Court for the Southern District of New York 500 Pearl Street New York, NY 10007

Re: <u>United States v. Nadine Menendez, (S4) 23-cr-490 (SHS)</u>

Dear Judge Stein:

I write in brief reply to the government's letter of this afternoon concerning Ms. Menendez's sentencing date.

Our respectful submission is that the material we seek to develop and elicit concerning Ms. Menendez is in everyone's interest, since it relates to matters that are inarguably directly relevant to the imposition of a just sentence. It is not that I need the additional time to write my presentence submission, but the individuals who will be gathering information and preparing reports are busy professionals who need time to provide material that will be complete and useful to the Court. My hope is that, by requesting a reasonable period of time for them to complete their work, there would be no need to ask the Court to revisit the schedule in this case.

Respectfully submitted,

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Barry Coburn